

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MICHAEL KOTOWSKI,

Plaintiff,

v.

JULIO CRUZ and J. B. HUNT
TRANSPORT INC,

Defendants.

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CASE NO.:

**COMPLAINT WITH DEMAND FOR
TRIAL BY JURY**

Plaintiff MICHAEL KOTOWSKI, by way of Complaint, states:

PARTIES

1. Plaintiff MICHAEL KOTOWSKI is an adult individual residing at 605 Carrock Way, Tamiment, PA 18371.
2. Defendant JULIO CRUZ is an adult individual residing at 794 Wethersfield Ave 3, Hartford, CT 06114.
3. Defendant J. B. HUNT TRANSPORT INC is an entity with an office located at 615 JB Hunt Corporate Dr., Lowell, AR 72745.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this claim against the Defendants pursuant to 28 U.S.C 1332.
5. The acts or omissions giving rise to the Plaintiff's claim, as well as the Plaintiff's subsequent medical treatment, occurred in the District of New Jersey. Venue is therefore proper under 28 U.S.C 1391(b).

ALLEGATIONS

6. On October 14, 2021, Plaintiff, MICHAEL KOTOWSKI, was the driver of a motor vehicle, which was traveling on New Jersey Turnpike South in Ridgefield Park, New Jersey.

7. At the same time and place aforesaid, Defendant JULIO CRUZ was driving a motor vehicle owned by Defendant J. B. HUNT TRANSPORT INC, which was also traveling on New Jersey Turnpike South in Ridgefield Park, New Jersey.

8. On or about October 14, 2021, an incident occurred when the Defendants' vehicle struck the Plaintiff's vehicle.

9. Defendant JULIO CRUZ operated the motor vehicle in such a careless and negligent manner so as to cause an accident with the Plaintiff's vehicle.

10. Defendant J. B. HUNT TRANSPORT INC negligently entrusted its vehicle to Defendant JULIO CRUZ.

11. At the time of the October 14, 2021 accident, Defendant JULIO CRUZ was an employee and/or agent of Defendant J. B. HUNT TRANSPORT INC and was acting within the scope of his employment/agency.

12. As a direct and approximate result of said accident, Plaintiff MICHAEL KOTOWSKI suffered severe painful bodily injuries, which injuries resulted in his obtaining medical treatment and sustaining loss wages which caused him great pain and suffering.

13. The acts or omissions by the Defendants described herein constitute the tort of negligence under the laws of the State of New Jersey.

WHEREFORE, Plaintiff MICHAEL KOTOWSKI demands judgment against Defendants, JULIO CRUZ and J. B. HUNT TRANSPORT INC, for damages, together with interest, cost of suit and attorneys' fees.

/s/ David Wasserman

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Attorneys for Plaintiff

Dated: September 6, 2022